

# **Exhibit 1**

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**From:** Cleary, Robert J. <RJCleary@proskauer.com>  
**Sent:** Wednesday, April 7, 2021 9:55 AM  
**To:** Levander, Samuel; Balter, Emily; Hartunian, Joseph S.; Vicens, Elizabeth (Lisa); Rosenthal, Jeffrey A.; Mgaloblishvili, Leila; Saenz, Andres  
**Cc:** DiGrande, Melissa; Komaroff, William C.  
**Subject:** RE: Perfectus Production

Sam –

The NY-licensed lawyer who will be responsible for this project is Joseph Z. Hellerstein. His contact information is:

[jzh@apm-law.com](mailto:jzh@apm-law.com)  
052-4201114 (cell)  
APM House, 18 Raoul Wallenberg St., Building D, 6th floor  
Ramat Hachayal, Tel Aviv  
6971915, Israel

Bob

**Robert J. Cleary**  
Member of the Firm  
Co-Chair, White Collar Group

**Proskauer**  
Eleven Times Square  
New York, NY 10036-8299  
d 212.969.3340  
f 212.969.2900  
[rjcleary@proskauer.com](mailto:rjcleary@proskauer.com)

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**From:** Cleary, Robert J.  
**Sent:** Monday, April 5, 2021 5:01 PM  
**To:** 'Levander, Samuel' <slevander@cgsh.com>; Balter, Emily <ebalter@cgsh.com>; Hartunian, Joseph S. <JHartunian@proskauer.com>; Vicens, Elizabeth (Lisa) <evicens@cgsh.com>; Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Mgaloblishvili, Leila <lmgaloblishvili@cgsh.com>; Saenz, Andres <asaenz@cgsh.com>  
**Cc:** DiGrande, Melissa <MDigrande@proskauer.com>; Komaroff, William C. <wkomaroff@proskauer.com>  
**Subject:** RE: Perfectus Production

Sam –

Mr. Levy's firm is in possession of the documents from Bryan Cave and will be able to address your timeline question. We will not be supervising the work of Mr. Levy's firm. That firm has its own NY-licensed partners; it is our understanding that one of them will be supervising this project.

Bob

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Co-Chair, White Collar Group

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**From:** Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>  
**Sent:** Monday, April 5, 2021 9:58 AM  
**To:** Cleary, Robert J. <[RJCleary@proskauer.com](mailto:RJCleary@proskauer.com)>; Balter, Emily <[ebalter@cgsh.com](mailto:ebalter@cgsh.com)>; Hartunian, Joseph S. <[JHartunian@proskauer.com](mailto:JHartunian@proskauer.com)>; Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Mgaloblishvili, Leila <[Imgaloblishvili@cgsh.com](mailto:Imgaloblishvili@cgsh.com)>; Saenz, Andres <[asaenz@cgsh.com](mailto:asaenz@cgsh.com)>  
**Cc:** DiGrande, Melissa <[MDigrande@proskauer.com](mailto:MDigrande@proskauer.com)>; Komaroff, William C. <[wkomaroff@proskauer.com](mailto:wkomaroff@proskauer.com)>  
**Subject:** RE: Perfectus Production

***This email originated from outside the Firm.***

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Bob,

We are writing to follow up on our March 22, 2021 email – please acknowledge that you will be supervising Mr. Levy and will be responsible to certify Perfectus's production, and please provide us with a timeline for further productions.

We are available for a call to discuss.

Best regards,  
Sam

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**Samuel Levander**  
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T: +1 212 225 2951  
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**From:** Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>  
**Sent:** Monday, March 22, 2021 4:57 PM  
**To:** [rjcleary@proskauer.com](mailto:rjcleary@proskauer.com); Balter, Emily <[ebalter@cgsh.com](mailto:ebalter@cgsh.com)>; Hartunian, Joseph S. <[JHartunian@proskauer.com](mailto:JHartunian@proskauer.com)>; Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Mgaloblishvili, Leila <[Imgaloblishvili@cgsh.com](mailto:Imgaloblishvili@cgsh.com)>; Saenz, Andres <[asaenz@cgsh.com](mailto:asaenz@cgsh.com)>  
**Cc:** DiGrande, Melissa <[MDigrande@proskauer.com](mailto:MDigrande@proskauer.com)>; Komaroff, William C. <[wkomaroff@proskauer.com](mailto:wkomaroff@proskauer.com)>  
**Subject:** RE: Perfectus Production

Bob, all,

We write in response to your note that Doron Levy, Beny Steinmetz's Israeli attorney, will be handling Perfectus's document production going forward. We understand that Mr. Levy is not a member of any U.S. bar and is not admitted

to practice in the Southern District of New York, so please confirm to us that you will be supervising Mr. Levy and will be responsible to certify Perfectus's production.

Separately, we understand that Bryan Cave provided you with an additional tranche of documents. Please provide us with the timeline for your production of those documents.

Best regards,

Sam

---

**Samuel Levander**

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One Liberty Plaza, New York NY 10006  
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slevander@cgsh.com | clearygottlieb.com

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**From:** Cleary, Robert J. <[RJCleary@proskauer.com](mailto:RJCleary@proskauer.com)>

**Sent:** Thursday, March 18, 2021 8:08 PM

**To:** Balter, Emily <[ebalter@cgsh.com](mailto:ebalter@cgsh.com)>; Hartunian, Joseph S. <[JHartunian@proskauer.com](mailto:JHartunian@proskauer.com)>; Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Mgaloblishvili, Leila <[lmgaloblishvili@cgsh.com](mailto:lmgaloblishvili@cgsh.com)>; Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>; Saenz, Andres <[asaenz@cgsh.com](mailto:asaenz@cgsh.com)>

**Cc:** DiGrande, Melissa <[MDigrande@proskauer.com](mailto:MDigrande@proskauer.com)>; Komaroff, William C. <[wkomaroff@proskauer.com](mailto:wkomaroff@proskauer.com)>

**Subject:** RE: Perfectus Production

My apologies for the delay.

We will be producing more documents on behalf of Perfectus tomorrow.

Please note: Perfectus has retained a new law firm to handle the document production going forward. The principal contact and his firm are:

Doron Levy, Partner  
APM & Co.  
APM House  
18 Raoul Wallenberg St., Building D  
Tel Aviv, Israel 6971915  
Office: +972-3-5689000 | Direct: +972-3-5689090 | Mobile: +972-52-3272100  
email: [doron@apm.law](mailto:doron@apm.law)

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[rjcleary@proskauer.com](mailto:rjcleary@proskauer.com)

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**From:** Balter, Emily <[ebalter@cgsh.com](mailto:ebalter@cgsh.com)>  
**Sent:** Monday, March 15, 2021 8:50 PM  
**To:** Hartunian, Joseph S. <[JHartunian@proskauer.com](mailto:JHartunian@proskauer.com)>; Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Mgaloblishvili, Leila <[imgaloblishvili@cgsh.com](mailto:imgaloblishvili@cgsh.com)>; Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>; Saenz, Andres <[asaenz@cgsh.com](mailto:asaenz@cgsh.com)>  
**Cc:** DiGrande, Melissa <[MDigrande@proskauer.com](mailto:MDigrande@proskauer.com)>; Cleary, Robert J. <[RJCleary@proskauer.com](mailto:RJCleary@proskauer.com)>; Komaroff, William C. <[wkomaroff@proskauer.com](mailto:wkomaroff@proskauer.com)>  
**Subject:** RE: Perfectus Production

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Bob,

We are once again writing to request that you inform us when you expect to make your further productions – you have ignored the multiple emails I've sent following up on the commitment you made more than five weeks ago to promptly produce additional Perfectus documents on a rolling basis. Please respond.

We are also available to discuss the status of the production by phone.

Best,  
Emily

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**Emily Balter**  
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Assistant: [ecarswell@cgsh.com](mailto:ecarswell@cgsh.com)  
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T: +1 212 225 2189  
[ebalter@cgsh.com](mailto:ebalter@cgsh.com) | [clearygottlieb.com](http://clearygottlieb.com)

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**From:** Balter, Emily  
**Sent:** Monday, March 8, 2021 1:03 PM  
**To:** 'Hartunian, Joseph S.' <[JHartunian@proskauer.com](mailto:JHartunian@proskauer.com)>; Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Mgaloblishvili, Leila <[imgaloblishvili@cgsh.com](mailto:imgaloblishvili@cgsh.com)>; Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>; Saenz, Andres <[asaenz@cgsh.com](mailto:asaenz@cgsh.com)>  
**Cc:** 'DiGrande, Melissa' <[MDigrande@proskauer.com](mailto:MDigrande@proskauer.com)>; [rjcleary@proskauer.com](mailto:rjcleary@proskauer.com); 'Komaroff, William C.' <[wkomaroff@proskauer.com](mailto:wkomaroff@proskauer.com)>  
**Subject:** RE: Perfectus Production

Bob and all,

Following up on the below, please let us know when you will make your further production(s). It has now been more than a month since you indicated that you would produce additional documents "as expeditiously as possible." We are available for a call if you would like to discuss.

Best,  
Emily

---

**Emily Balter**  
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One Liberty Plaza, New York NY 10006

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ebalter@cgsh.com | clearygottlieb.com

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**From:** Balter, Emily  
**Sent:** Monday, March 1, 2021 12:36 PM  
**To:** 'Hartunian, Joseph S.' <[JHartunian@proskauer.com](mailto:JHartunian@proskauer.com)>; Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Mgaloblishvili, Leila <[lmgaloblishvili@cgsh.com](mailto:lmgaloblishvili@cgsh.com)>; Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>; Saenz, Andres <[asaenz@cgsh.com](mailto:asaenz@cgsh.com)>  
**Cc:** DiGrande, Melissa <[MDigrande@proskauer.com](mailto:MDigrande@proskauer.com)>; [rjcleary@proskauer.com](mailto:rjcleary@proskauer.com); Komaroff, William C. <[wkomaroff@proskauer.com](mailto:wkomaroff@proskauer.com)>  
**Subject:** RE: Perfectus Production

Counsel,

In the cover letter to your production of February 5, 2021, you indicated that you would produce additional responsive documents on a rolling basis and as expeditiously as possible. It has now been three weeks, and we have not received any additional documents from you. Please let us know when you will make your further production(s).

Best,  
Emily

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---

**From:** Hartunian, Joseph S. [<mailto:JHartunian@proskauer.com>]  
**Sent:** Friday, February 5, 2021 1:53 PM  
**To:** Berdugo, Emmanuelle <[eberdugo@cgsh.com](mailto:eberdugo@cgsh.com)>; Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Mgaloblishvili, Leila <[lmgaloblishvili@cgsh.com](mailto:lmgaloblishvili@cgsh.com)>; Balter, Emily <[ebalter@cgsh.com](mailto:ebalter@cgsh.com)>; Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>; Saenz, Andres <[asaenz@cgsh.com](mailto:asaenz@cgsh.com)>  
**Cc:** DiGrande, Melissa <[MDigrande@proskauer.com](mailto:MDigrande@proskauer.com)>; [rjcleary@proskauer.com](mailto:rjcleary@proskauer.com); Komaroff, William C. <[wkomaroff@proskauer.com](mailto:wkomaroff@proskauer.com)>  
**Subject:** Perfectus Production

I'm using Mimecast to share large files with you. Please see the attached instructions.

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Hello,

Please see attached for a cover letter and link to a production being sent via Mimecast. The password for the zip file is H\_y4L(Zn\PA5~Q6b. Mimecast will provide a separate key to access the file. Please let me know if you have any issues accessing the production.

Regards,  
Joe Hartunian

**Joseph Hartunian**  
Associate

**Proskauer**  
1001 Pennsylvania Ave N.W.

Suite 600 South  
Washington, D.C. 20004-2533  
Phone: +1.202 416.6859  
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